

ORIGINAL



Script To Screen
PRODUCTIONS

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November 29, 1993

The Honorable Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Commercial Time Limitations on Television Broadcast
Stations, MM Docket No. 93-254

Dear Ms. Searcy:

The following is intended to represent our opposition to any changes in the limitations on the amount of commercial matter broadcast by television stations.

Script To Screen Productions is a firm that produces commercials and infomercials for advertisers on both a local and national basis.

We have been producing infomercials over the past five years. The success we have had has been phenomenal. As a company, and as a matter of philosophy, we take great pride in bringing good and worthwhile products to television by way of infomercials. We look for products that can truly make a difference in peoples' lives. Some of the products we have produced infomercials for include, "Hooked On Phonics," a learn to read program, and "The Braun Oral B Plaque Remover," an electric toothbrush. While these are just two products, of many, that span product categories from Time Life's "Fabulous Fifties," music, to the Schwinn "Stair Climber," a fitness product, all products we bring to consumer awareness via

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infomercials are high quality products, and consumers throughout this country thank us for the various products that have had an important impact on their lives.

Irrespective of any one's political persuasion it should be obvious, the tremendous and positive impact infomercials have had on consumers as well as product owners and manufacturers. Infomercials provide manufacturers and producers with the ability to convey their message to the public. The infomercial message also provides the consumer public a better understanding of products, before they actually make a purchasing decision.

One thing however, remains constant, whether it is a 30 second commercial or a 30 minute infomercial, the consumer is king and queen relative to whether or not they will accept the proposition that is being advanced.

The ability to change the channel or remain on the channel gives the consumer the freedom to select that which they choose to watch and listen to.

Due to the tremendous number of new cable channels, there is obviously more than enough air time and more than enough selections for people who choose not to watch or are opposed to watching infomercials.

Many years ago when there was a limited selection of channels it might have made sense to have limitations. Today as we have said, the option for viewing is so numerous that a half hour infomercial or a series of half hour infomercials are not going to be an imposition or limitation on any one's viewing time.

Retailers, manufacturers, and producers are all spending a great deal of money not only in producing their infomercial but in airing them, not only on broadcast stations but cable stations as well. The ability to be creative in our communications efforts from the retailer to the consumer is something that should be encouraged and expanded, not discouraged.

We have seen tremendous growth in this industry. We have watched one of our clients top the list of media buyers on a particular broadcast network. We are starting to see retailers build a name for their retail products through educating the consumer with the infomercial. The advent and acceptance of homeshopping networks that provide people the opportunity to purchase via television is yet another example of public acceptance of such programming.

Our economy is starting to move once again. Infomercials have had a tremendous stimulus in moving product and helping consumers make selections with more knowledge than was available to them in the past. The ability for the consumer to have in-depth knowledge and awareness of a product through the half hour infomercial has been extremely helpful to consumers.

We have seen whole new industries flourish because the infomercial provided the supplier the opportunity to educate the consumer in a way that was not possible in the print media or 30 second spots.

While we believe it is always healthy for our Federal Government to analyze industries and the products various industries create, we believe that a prudent review of infomercials, the successes and failures of infomercials, will lead you to believe as we believe that putting limitations on commercials is unnecessary. Limitations are unnecessary because the consumer; A) If they don't like it, will ignore it, and B) If they don't like it, have plenty of alternatives that they can turn to for alternate viewing so that they are not held captive by a monopoly of three or four broadcast stations in a given marketplace.

We would be happy to provide any additional information that you might deem helpful in your pursuit of information. We will also be willing to share with you the infomercials that we have produced or answer any questions that you may have.

We encourage you to contact us. The infomercial industry is one that we are committed to. It has provided us an avenue of business that was not there before and would completely terminate a major portion of our activities if limitations were imposed.

To the extent that your decision would have a financial impact on us, we are perhaps not totally objective, but we believe with full scrutiny of the industry, the people involved and the messages communicated that you will find that the consumer is better served through the advent of infomercials than they are with a limited number of messages within a given period of time.

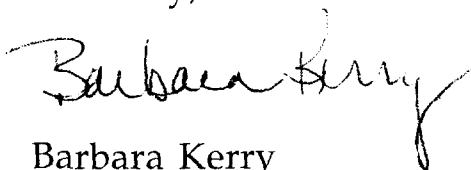
As a consumer in this country and as a television viewer, I have been reading for years, about the time when television would be an interactive element in my home. I would be able to shop at home, be educated in my home and my viewing choices would be many. That time is upon us and television as we have known it is changing.

In a time when there is much discussion about the general public's tendency toward "cocooning," it would seem as though our ability to educate, inform and sell to the viewing public through television at home should be a viable and alternative form of television, and ultimately a viewing choice left to one's sole discretion.

We believe very strongly in supply and demand, in good products having staying power, while bad or inappropriate products fail to have any longevity in the marketplace. We believe very strongly that there is a place for infomercials in television, and the tremendous public support that has been given to such programming and the various products seems to be testimony to that end.

We thank you for your consideration and we ask for you to determine that limitations are not necessary.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Kerry". The signature is fluid and elegant, with a large initial 'B' and a long, sweeping tail on the 'y'.

Barbara Kerry
Principal